

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



November 30, 2012

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at Space Systems/Loral's Reception on December 5, 2012

On December 5, 2012, Space Systems/Loral is hosting a cocktail reception at the Marriot Hotel at Convention, in San Francisco, CA from 5 PM - 8:00 PM. The purpose of this event is to have informal discussions among the interested community about scientific instruments on geostationary communication satellites.

Representatives from academia, industry, and other civilians of Federal agencies will attend this event. About 40-45 people are expected to attend. The estimated cost of the reception, including all food and beverages, is approximately \$30 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. However, NASA employees whose duties may substantially affect [the sponsor], such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). We understand that Space Systems/Loral will be distributing 5"x7" notebooks valued at \$4.00, and USB memory devices valued at \$3.00.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone